

From: Sheean, Christopher [mailto:sheean@wildmanharrold.com]
Sent: Friday, December 01, 2006 12:06 PM
To: Williams, Robert
Subject: RE: IKE/VEO

Bob,

The court ordered VEO to produce the documents - to the extent VEO had such documents in its possession. VEO has conducted a search and has no budget estimates and no final purchase orders from the clients for the boilers VEO sold while IKE was the licensor. In addition, as VEO specifically identified in its response to IKE's Motion, it does not maintain manhours other than how VEO has already produced them. Accordingly, VEO has no additional documents to produce relative to the profit issue.

With respect to drawings of the Voyager line, we dispute your claim that VEO has failed to produce drawings of various components of the Voyager line. VEO has produced several drawings showing the Voyager tube arrangements. A review of the drawings produced to date shows that Mr. Siebel has more than enough information to allow him to render his opinions. However, VEO will make production of drawings of the refractory tile insulation in the next week.

Chris